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APR 25 2001

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April 19, 2001

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96-981

Via Regular Mail

Secretary
Federal Communications Commission
445 12th Street, S.W., 6th Floor
Washington, D.C. 20554

Attn: Common Carrier Bureau

Dear Secretary:

On this date, Premiere Network Services, Inc. submitted an informal request for action for filing. Enclosed please find two copies of this presentation for inclusion in the public record.

Sincerely,



Myra A. McDaniel
Attorney for
Premiere Network Services, Inc.

MAM/cg
Enclosures

Copy to record
FBI

CH

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APR 25 2001

April 19, 2001

FCC MAIL ROOM

Via Overnight Mail

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

Re: CC Docket 96-98; In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Administration of the North American Number Plan

Dear Sir/Madam:

In accordance with Section 1.41, Premiere Network Services, Inc. is submitting an original and 4 copies of the enclosed informal request for action. Two copies of this presentation have been submitted under separate cover to the Commission's secretary for inclusion in the public record.

Please acknowledge receipt of this transmittal by returning a date-stamped copy of the enclosed duplicate of this cover letter in the self-addressed stamped envelope provided for this purpose.

Please address any inquiries or further correspondence regarding this filing to my attention at the address above.

Sincerely,



Myra A. McDaniel

Attorney for

Premiere Network Services, Inc.

MAM/cg

Enclosures

cc: Mr. Norman Epstein, INC Moderator
Ms. Catrina Akers, ATIS Committee Administrator
1200 G. St., N.W.
Suite 500
Washington, D.C. 20005

Mr. Tom Horn
Southwestern Bell Telephone Co.
1616 Guadalupe, Room 600
Austin, Texas 78701

Ms. Julie Peterson .

SBC Communications - via e-mail jspeter@msg.pacbell.com

Nancy Frears

NANPA - via facsimile 202-887-0331

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of

Implementation of the Local Competition	§	
Provisions of the Telecommunications Act	§	
Of 1996	§	CC Docket 96-98
	§	
Administration of the North American	§	
Numbering Plan	§	

**EX PARTE REQUEST FOR EXTENSION OF DATE FOR RECLAMATION
OF 555-NXX NUMBERS AND FOR EXPEDITED ACTION**

NOW COMES Premiere Network Services, Inc. ("Premiere") and files this informal request that the Federal Communications Commission ("Commission") extend the date for reclamation of 555-NXX numbers until May 1, 2002 to permit Premiere to complete its negotiations with Southwestern Bell Telephone Company (SWBT) and put into service certain of the 555-NXX numbers owned by Premiere's customers. The reclamation date is currently scheduled for the end of this month. Therefore, Premiere requests expedited action on its request. In support of its request, Premiere would show the Commission as follows:

I.

The Federal Communications Commission has jurisdiction of this matter under 47 U.S.C.A. §251(e)(1).

II.

Premiere has been diligent in its attempts to get 555-NXX service deployed for its customers. Premiere is a designer CLEC that provides value-added, enhanced services to its customers. Premiere designed a 555-NXX service that would require several common existing unbundled network elements ("UNE") and minimal reprogramming of ILEC switches. The

service was requested by several of Premiere's customers who had acquired ownership of the 555-NXX numbers. In order to provide this service, Premiere requested the required UNEs from Southwestern Bell Telephone Company (SWBT) under its interconnection agreement. Premiere first requested assistance in provision of the service under a confidential settlement agreement entered into between SWBT and Premiere on November 15, 1999. After three months of negotiation, Premiere filed a complaint with the Public Utility Commission of Texas on March 27, 2000, to address its inability to obtain the requested UNEs from SWBT. Pursuant to the Arbitrator's Order in PUC Docket 22293, Premiere initiated a "special request" on April 27, 2000 requesting SWBT to make specific minor routing table changes in the SWBT local and/or tandem switch and provided technical instructions for accomplishing the changes. Premiere offered to pay a rate of \$3.06, subject to true-up after a final cost was determined. After successful mediation, Premiere moved to withdraw its complaint on November 22, 2000. Premiere and SWBT have diligently worked since that date to provision the 555-NXX service and Premiere has been assured that SWBT will deliver pricing, terms and timeline for 555-NXX service to Premiere not later than April 27, 2001. Premiere anticipates that the provision of service should be accomplished within six to twelve months after the pricing and terms are agreed upon.

III.

Premiere has signed customers and orders which have languished for upwards of 18 months. Additionally Premiere has received interest from either the holders of, or persons representing the holders of some 4500 assigned 555 numbers during this period. Many of these customers call regularly to find out when they will be provisioned and are threatening to pursue other avenues to get service. One major airline customer of Premiere has waited nearly two

years and needs the service now as a means of providing 7-digit safety to cellular customers calling its reservations lines for gate information. Another of Premiere's customers has predicated its business plan largely on Premiere's ability to provide service, including financial commitments and a stock sale. Although it has taken much longer than these customers and Premiere envisioned to configure the technical model, it will shortly be possible to provide these services.

IV.

Premiere requests expedited action on this request so that the reclamation will not occur prior to Commission action. As set out above, Premiere has diligently attempted to work through the technical difficulties with Southwestern Bell Telephone Company (a subsidiary of SBC) for almost a year and a half. The necessity for extending the reclamation date did not become apparent until this week.

V.

Two copies of this presentation have been submitted under separate cover to the Commission's secretary for inclusion in the public record.

VI.

WHEREFORE, premises considered, Premiere Network Services, Inc., requests that the Commission will enter an order delaying reclamation of 555-NXX numbers until May 1, 2002; and awarding Premiere such other relief as it may be entitled under law.

Respectfully submitted,

Bickerstaff, Heath, Smiley, Pollan,
Kever & McDaniel
816 Congress Avenue, Suite 1700
Austin, Texas 78701
(512) 472-8021
(512) 320-5638 (facsimile)



By: Myra A. McDaniel
State Bar No. 13520300

ATTORNEYS FOR PREMIERE NETWORK
SERVICES, INC.